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18 UNITED STATES DISTRICT COURT
19 SOUTHERN DISTRICT OF CALIFORNIA

20 IN RE: MIDLAND CREDIT
21 MANAGEMENT, INC.,
TELEPHONE CONSUMER
22 PROTECTION ACT LITIGATION.

Case No. 11-md-2286 MMA (MDD)

Member Cases: 10-cv-02261
10-cv-02600
10-cv-02368
10-cv-02370

**JOINT MOTION TO CONTINUE
EXPERT DISCLOSURE AND
OTHER DISCOVERY DEADLINES**

1 Following the telephonic status conference held on July 31, 2014 with United
2 States Magistrate Judge Mitchell D. Dembin, the parties file this Joint Motion to
3 Continue Expert Disclosure and other Discovery Deadlines. The parties continue
4 to work to reduce the terms of their settlement to writing and are scheduled to meet
5 with the mediator Judge Herbert Hoffman (Ret.) on August 13, 2014.

6 The Court's Order Amending Case Management Order issued June 27, 2014
7 (Doc. No. 110), sets the deadline for expert disclosures required by Fed. R. Civ. P.
8 26(a)(2) as August 1, 2014, the deadline for contradictory or rebuttal disclosures
9 within the meaning of Rule 26(a)(2)(D)(ii) as August 22, 2014, the deadline for
10 completion of fact and expert discovery as September 30, 2014, and the deadline
11 for Plaintiffs to file a motion for class certification as October 27, 2014.

12 Given that reducing the settlement to writing is taking longer than expected,
13 the parties request that these deadlines be extended to the following:

14 1. All expert disclosures required by Fed.R.Civ.P. 26(a)(2) shall be
15 served on all parties on or before October 1, 2014.

16 2. Any contradictory or rebuttal disclosures within the meaning of Rule
17 26(a)(2)(D)(ii) shall be served on all parties on or before October 17, 2014.

18 3. All fact and expert discovery necessary to support or oppose class
19 certification shall be completed by October 27, 2014.

20 4. The October 27, 2014 deadline for filing the motion for class
21 certification shall remain the same.

1 Dated: July 31, 2014

2 By s/ Edward D. Totino
3 WILLIAM S. BOGGS
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11 Attorneys for Defendants
12 Midland Funding LLC, Midland Credit
13 Management, Inc., and Encore Capital
14 Group

15 Dated: July 31, 2014

16 LAW OFFICES OF DOUGLAS J.
17 CAMPION, APC

18 By s/ Douglas J. Campion
19 DOUGLAS J. CAMPION

20 Dated: July 31, 2014

21 EDELMAN, COMBS, LATTURNER &
22 GOODWIN, LLC

23 By s/ James O. Latturner
24 JAMES O. LATTURNER

25 Co-Lead Counsel for Plaintiffs
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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, California, 90067. On July 31, 2014, I served the within document(s):

**JOINT MOTION TO CONTINUE EXPERT DISCLOSURE AND
OTHER DISCOVERY DEADLINES**

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, for delivery via overnight/express service carrier at San Diego, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below on this date before the close of normal business hours.
- ☐ by transmitting via electronic mail a copy of the document(s) listed above in .pdf format, with no transmission errors reported, to the person(s) at the e-mail address(es) denoted on the Electronic Mail notice list.
- ☒ I hereby certify that on the below date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

I declare that I am employed in the office of a member of the Bar of or permitted to practice before this Court at whose direction the service was made.

Executed on July 31, 2014, at Los Angeles, California.



Ann Lozinski